

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

INDICTMENT

(1) WENDINBOUDE OUEDRAOGO,
(2) ROMARIC SOMPOUGDOU,
(3) WENLASOMBO ILBOUDO,
(4) HABIB FORO,
(5) ARISTIDE ZONG-NABA,
(6) JEAN LOIC OUEDRAOGO,
(7) RONNIE RAINES, and
(8) DUSHAUN KENNEDY,

18 U.S.C. § 2
18 U.S.C. § 1028A
18 U.S.C. § 1344
18 U.S.C. § 1349
18 U.S.C. § 1708

Defendants.

THE UNITED STATES GRAND JURY CHARGES:

At times relevant to this Indictment:

OVERVIEW

1. Company A is the subsidiary of an international insurance company. Company A's headquarters are located outside of Minneapolis, Minnesota. Company A provides crop insurance to farmers located throughout the country. Company A provides private insurance as well as Multiple Peril Crop Insurance through the Federal Crop Insurance Program, administered by the United States Department of Agriculture.

2. On a daily basis, Company A prints hundreds of insurance claim checks and other crop insurance statements for its insurance customers. Claim checks are printed at Company A's headquarters in Minnesota and typically mailed to claimants

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the same or the following day. Company A contracted with a courier service to deliver mail to the Company A headquarters and to transport the claims checks and other outgoing mail to a mail presorting provider, Pitney Bowes, located in Fridley, Minnesota.

3. Defendant DUSHUAN KENNEDY was an employee of the courier service. KENNEDY's responsibilities included transporting mail from Company A to a Pitney Bowes presorting facility. KENNEDY stole insurance checks and sent them to defendant RONNIE RAINES.

4. Defendant WENDINBOUDE OUEDRAOGO obtained the stolen checks from RAINES. WENDINBOUDE OUEDRAOGO distributed the stolen checks to a network of individuals who fraudulently opened bank accounts into which they deposited the stolen checks.

5. Defendants ROMARIC SOMPOUGDOU, WENLASOMBO ILBOUDO, HABIB FORO, ARISTIDE ZONG-NABA, and JEAN LOIC OUEDRAOGO used fake passports or driver's licenses to open bank accounts at various financial institutions in the names of the payees on the stolen insurance checks. The defendants then deposited the stolen checks into the accounts and misappropriated the funds.

COUNT 1

(Conspiracy to Commit Mail Fraud)

6. The allegations in paragraphs 1 through 5 of the Indictment are incorporated herein.

7. From at least in or about August 2022 through in or about March 2023, in the State and District of Minnesota, and elsewhere, the defendants,

WENDINBOUDE OUEDRAOGO,
ROMARIC SOMPOUGDOU,
WENLASOMBO ILBOUDO,
HABIB FORO,
ARISTIDE ZONG-NABA,
JEAN LOIC OUEDRAOGO
RONNIE RAINES, and
DUSHAUN KENNEDY,

did knowingly conspire with each other, and others known and unknown to the grand jury, to devise a scheme and artifice to defraud and to obtain money by materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, caused the sending, delivering, and receipt of various matters and things by United States Postal Service and private and commercial interstate carrier, in violation of Title 18, United States Code, Section 1349.

Overview and Purpose of the Conspiracy

8. The purpose of the conspiracy was to obtain stolen checks provided by Company A and fraudulently misappropriate the funds. The defendants did this by stealing the insurance checks that Company A had mailed to claimants around the country. The stolen checks were then mailed to RAINES, who provided the checks to OUEDRAOGO and the other defendants. Those defendants used fake passports and driver's licenses to open bank accounts in the names of the intended payees of the stolen checks. The defendants used these accounts to deposit the checks. The defendants misappropriated and stole the funds that were deposited into the accounts.

Manner and Means of the Conspiracy

9. The defendants were involved in a fraud scheme that misappropriated crop insurance checks from Company A that were intended to pay claims by farmers throughout the country.

10. Company A used a courier service to transport the crop insurance checks from its facility to a Pitney Bowes mail presorting facility. KENNEDY was an employee of the courier who frequently transported mail shipments from Company A to the mail presorting facility. KENNEDY stole at least 32 mailings containing crop insurance checks.

11. KENNEDY mailed the stolen crop insurance checks to RAINES at addresses under RAINES's control in and around Houston, Texas. KENNEDY sent the stolen checks via U.S. Priority Mail Express.

12. After receiving the stolen checks, RAINES gave them to WENDINBOUDE OUEDRAOGO. WENDINBOUDE OUEDRAOGO utilized a network of individuals in the Houston area to fraudulently deposit the checks and misappropriate the funds.

13. Defendants ROMARIC SOMPOUGDOU, WENLASOMBO ILBOUDO, HABIB FORO, ARISTIDE ZONG-NABA, and JEAN LOIC OUEDRAOGO obtained fake identification, including fake passports and fake driver's licenses, in the name of the payees of the stolen checks. The defendants used the fake identification to pass themselves off as the individual to whom the check was made payable.

14. Defendants ROMARIC SOMPOUGDOU, WENLASOMBO ILBOUDO, HABIB FORO, ARISTIDE ZONG-NABA, and JEAN LOIC OUEDRAOGO used fake

identification to open bank accounts in the name of the individual to whom the insurance claim check was made out to at local branches of banks primarily in the Houston area. The defendants deposited the checks into the account. The defendants misappropriated the funds by withdrawing the funds or transferring the funds into other accounts.

15. During the course of their scheme, the defendants stole and misappropriated at least 32 checks with a total value of approximately \$1,669,061.

All in violation of Title 18, United States Code, Section 1349.

Counts 2-6
(Bank Fraud)

16. The allegations in paragraphs 1 through 15 of the Indictment are incorporated herein.

17. At times relevant to this Indictment, Company A maintained the funds underlying the insurance claim checks with Wells Fargo. The deposits of Wells Fargo were insured by the Federal Deposit Insurance Corporation.

18. Beginning at least in or about August 2022 through in or about March 2023, the defendants and others known and unknown to the grand jury devised a scheme to defraud a financial institution and obtain moneys from a financial institution by means of materially false and fraudulent representations.

19. It was the purpose of the scheme that the defendants and others known and unknown to the grand jury enriched themselves by fraudulently obtaining or attempting to obtain money from the accounts of victims held at a financial institution by using stolen financial instruments, such as checks, and unlawfully

using the personal identification information of victims, including, but not limited to, the victims' names.

20. To effectuate the scheme, the defendants obtained stolen and fraudulently attained checks to use to unlawfully obtain money by depositing the checks.

21. On or about the dates set forth below, in the State and District of Minnesota, and elsewhere, the defendants,

WENDINBOUDE OUEDRAOGO,
ROMARIC SOMPOUGDOU,
WENLASOMBO ILBOUDO,
HABIB FORO,
ARISTIDE ZONG-NABA,
JEAN LOIC OUEDRAOGO,
RONNIE RAINES, and
DUSHAUN KENNEDY,

aided and abetted by others known and unknown to the grand jury, having devised and attempted to devise a scheme and artifice to defraud a financial institution, and to obtain the moneys and funds owned by and under the custody and control of a financial institution, by means of materially false and fraudulent pretenses, representations and promises, did knowingly execute and attempt to execute the scheme and artifice as follows:

2	ARISTIDE ZONG-NABA RONNIE RAINES DUSHAUN KENNEDY	August 15, 2022	Caused the deposit of a stolen RCIS check payable to victim K.S. in the amount of \$8,330 issued by Wells Fargo.

3	HABIB FORO RONNIE RAINES DUSHAUN KENNEDY	September 22, 2022	Caused the deposit of a stolen RCIS check payable to victim M.L. in the amount of \$44,125 issued by Wells Fargo.
4	ROMARIC SOMPOUGDOU RONNIE RAINES DUSHAUN KENNEDY	September 28, 2022	Caused the deposit of a stolen RCIS check payable to victim J.L. in the amount of \$111,564 issued by Wells Fargo.
5	WENLASOMBO ILBOUDO RONNIE RAINES DUSHAUN KENNEDY	February 23, 2023	Caused the deposit of a stolen RCIS check payable to victim B.S. in the amount of \$16,785 issued by Wells Fargo.
6	WENDINBOUDE OUEDRAOGO JEAN LOIC OUEDRAOGO RONNIE RAINES DUSHAUN KENNEDY	February 28, 2023	Caused the deposit of a stolen RCIS check payable to victim G.P. in the amount of \$14,592 issued by Wells Fargo.

All in violation of Title 18, United States Code, Sections 1344 and 2.

Counts 7-11

(Aggravated Identity Theft)

22. The allegations in paragraphs 1 through 21 of the Indictment are incorporated herein.

23. On or about the dates set forth below, in the State and District of Minnesota, and elsewhere, the defendants,

ROMARIC SOMPOUGDOU,
WENLASOMBO ILBOUDO,
HABIB FORO,
ARISTIDE ZONG-NABA, and
JEAN LOIC OUEDRAOGO,

did knowingly transfer, possess, and use and attempt to do so, without lawful authority, a means of identification of another person, to wit: the name, which is a means of identification of another person within the meaning of Title 18, United States Code, Section 1028(d)(7), as alleged in each count below, during and in relation

to the commission of a felony violation enumerated in Title 18, United States Code, Section 1028A(c), specifically, bank fraud and attempted bank fraud:

7	ARISTIDE ZONG-NABA	August 15, 2022	Unauthorized use of a means of identification of victim K.S. during and in relation to bank fraud as alleged in Count 2.
8	HABIB FORO	September 20, 2022	Unauthorized use of a means of identification of victim M.L. during and in relation to bank fraud as alleged in Count 3.
9	ROMARIC SOMPOUGDOU	October 11, 2022	Unauthorized use of a means of identification of victim J.L. during and in relation to bank fraud as alleged in Count 4.
10	WENLASOMBO ILBOUDO	February 22, 2023	Unauthorized use of a means of identification of victim B.S. during and in relation to bank fraud as alleged in Count 5.
11	JEAN LOIC OUEDRAOGO	February 27, 2023	Unauthorized use of a means of identification of victim G.P. during and in relation to bank fraud as alleged in Count 6.

All in violation of Title 18, United States Code, Section 1028A.

Count 12
(Theft of Mail)

24. The allegations in paragraphs 1 through 23 of the Indictment are incorporated herein.

25. On or about February 14, 2023, in the State and District of Minnesota and elsewhere, the defendant,

DUSHAUN KENNEDY,

did steal, take, and abstract a letter from and out of an authorized depository for mail matter and mail receptable.

All in violation of Title 18, United States Code, Section 1708.

FORFEITURE ALLEGATIONS

26. Counts 1 through 12 of this Indictment are incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) in conjunction with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 982(a)(2)(A).

27. As the result of the offenses alleged in Counts 1-6 of this Indictment,

WENDINBOUDE OUEDRAOGO,
ROMARIC SOMPOUGDOU,
WENLASOMBO ILBOUDO,
HABIB FORO,
ARISTIDE ZONG-NABA,
JEAN LOIC OUEDRAOGO
RONNIE RAINES, and
DUSHAUN KENNEDY,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(2)(A) any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of violations of section 1344, mail fraud affecting a financial institution, or 1349, conspiracy to commit mail fraud affecting a financial institution.

28. As the result of the offenses alleged in Count 12 of this Indictment,

DUSHAUN KENNEDY,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(1)(C), in conjunction with Title 28, United States Code, Section 2461, any

property, real or personal, which constitutes or is derived from proceeds traceable to a violation of section 1708.

29. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON